

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

EVONNE BRYANT, *et al.*,

Plaintiffs,

VS.

CITY OF NORFOLK, *et al.*,

Defendant.

Civil Action No. 2:20-cv-00026

**ANSWER OF EXECUTIVE DIRECTOR RONALD JACKSON  
TO AMENDED COMPLAINT**

COMES NOW Defendant Ronald Jackson (“Mr. Jackson”), Executive Director of Norfolk Redevelopment and Housing Authority (“NRHA”), both in his individual and official capacity, by and through undersigned counsel, answers the Amended Complaint (ECF # 128) filed by Evonne Bryant, Sylvia Givens, Brandon Spratley, Conswayla Simmons, Residents of St. Paul’s Quadrant Tenant Group, and New Virginia Majority (the “Plaintiffs”) as follows:

## ANSWER TO ALLEGATIONS

1. For Mr. Jackson’s answers to paragraphs 1 through 180 of the Amended Complaint, Mr. Jackson incorporates by reference and adopts the responses of NRHA in NRHA’s Answer to the Amended Complaint (ECF # 138) (hereafter “NRHA’s Answer to Amended Complaint”).

## **AFFIRMATIVE DEFENSES**

1. Mr. Jackson has qualified immunity from individual liability for any of the actions alleged to have been taken by him in the Amended Complaint.

2. Any claims arising out of actions alleged to have been taken by Mr. Jackson in his official capacity in the Amended Complaint are redundant to the extent these same claims are asserted against NRHA, and should be dismissed as duplicative.

3. The Amended Complaint fails to state a claim against Mr. Jackson for which relief may be granted.

4. The Plaintiffs have not suffered any losses or damages as a result of any conduct by Mr. Jackson; further, such losses or damages (if any) were *de minimis*, insubstantial, or so speculative as to be not cognizable as a matter of law.

5. Mr. Jackson reserves the right to supplement this Answer and his Affirmative Defenses after discovery has been conducted.

**WHEREFORE**, Defendant Ronald Jackson prays that this Honorable Court dismiss the Amended Complaint and grant such other and further relief that this Honorable Court deems appropriate.

Dated: March 29, 2021

Respectfully submitted,

/s/  
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Attorneys for Ronald Jackson, Executive  
Director of Norfolk Redevelopment and  
Housing Authority, both in his individual  
and official capacity

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 29<sup>th</sup> day of March, 2021, a true and genuine copy of the foregoing document was sent via electronic mail by the Court's CM/ECF system to all counsel of record.

/s/  
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